

1 MICHAEL A. JACOBS (CA SBN 111664)
2 MJacobs@mofo.com
3 ARTURO J. GONZÁLEZ (CA SBN 121490)
4 AGonzalez@mofo.com
5 MORRISON & FOERSTER LLP
6 425 Market Street
7 San Francisco, California 94105-2482
8 Telephone: 415.268.7000
9 Facsimile: 415.268.7522

10 KAREN L. DUNN (*Pro Hac Vice*)
11 kdunn@bsfllp.com
12 HAMISH P.M. HUME (*Pro Hac Vice*)
13 hhume@bsfllp.com
14 BOIES SCHILLER FLEXNER LLP
15 1401 New York Avenue, N.W.
16 Washington DC 20005
17 Telephone: 202.237.2727
18 Facsimile: 202.237.6131

19 WILLIAM CARMODY (*Pro Hac Vice*)
20 bcarmody@susmangodfrey.com
21 SHAWN RABIN (*Pro Hac Vice*)
22 srabin@SusmanGodfrey.com
23 SUSMAN GODFREY LLP
24 1301 Avenue of the Americas, 32nd Floor
25 New York, NY 10019-6023
26 Telephone: 212.336.8330
27 Facsimile: 212.336.8340

28 Attorneys for Defendants
1 UBER TECHNOLOGIES, INC.
2 and OTTOMOTTO LLC

3 UNITED STATES DISTRICT COURT
4
5 NORTHERN DISTRICT OF CALIFORNIA
6
7 SAN FRANCISCO DIVISION

8 WAYMO LLC,
9 Plaintiff,
10 v.
11 UBER TECHNOLOGIES, INC.,
12 OTTOMOTTO LLC; OTTO TRUCKING LLC,
13 Defendants.

14 Case No. 3:17-cv-00939-WHA

15 **DEFENDANTS UBER
16 TECHNOLOGIES, INC. AND
17 OTTOMOTTO LLC'S
18 ADMINISTRATIVE MOTION TO
19 FILE UNDER SEAL THE
20 DECLARATION OF KEVIN
21 FAULKNER REGARDING GOOGLE
22 DRIVE AND GMAIL MIGRATION**

1 Pursuant to Civil Local Rules 7-11 and 79-5, Defendants Uber Technologies, Inc. and
 2 Ottomotto LLC (“Defendants”) submit this motion for an order to file under seal the Declaration
 3 of Kevin Faulkner Regarding Google Drive and Gmail Migration. Specifically, Defendants
 4 request an order granting leave to file under seal the confidential portions of the following
 5 documents:

6 Document	7 Portions to Be Filed Under Seal	8 Designating Party
9 Declaration of Kevin Faulkner Regarding Google Drive and Gmail Migration (“Faulkner Declaration”)	10 Highlighted Portions	11 Defendants

12 The blue-highlighted portions of the Faulkner Declaration contain contact information of a
 13 former employee. Defendants request this information be kept under seal to protect the privacy
 14 interests of a person involved in this litigation, which is currently the subject of extensive media
 15 coverage. (Declaration of Michelle Yang in Support of Defendants’ Administrative Motion to
 16 File Documents Under Seal (“Yang Decl.”) ¶ 3.) The blue-highlighted portions also contain a
 17 placeholder domain name used for migration of electronic information. Disclosure of this
 18 information could allow others to attempt to compromise the security of Uber’s internal electronic
 19 information systems by targeting specific placeholder domain names. (Yang Decl. ¶ 4.)

20 Pursuant to Civil Local Rule 79-5(d)(2), Defendants will lodge with the Clerk the
 21 documents at issue, with accompanying chamber copies.

22 Defendants served Waymo with this Administrative Motion to File Documents Under
 23 Seal on September 29, 2017.

24 For the foregoing reasons, Defendants request that the Court enter the accompanying
 25 Proposed Order granting Defendants’ Administrative Motion to File Documents Under Seal and
 26 designate the service copies of these documents as “CONFIDENTIAL.”

1 Dated: September 29, 2017

MORRISON & FOERSTER LLP

2 By: /s/ Arturo J. González
3 ARTURO J. GONZÁLEZ

4 Attorneys for Defendants
5 UBER TECHNOLOGIES, INC. and
OTTOMOTTO LLC

6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28